

1. Local Rule 7.1(f) requires parties to obtain leave of the Court to file suggestions in opposition to a motion in excess of 15 pages.
2. On March 12, 2010, Plaintiffs filed a First Amended Petition (“Amended Petition”) in Missouri state court which substantially expands the nature and number of claims asserted. It alleged for the first time that State Street both breached the Securities Lending Authorization Agreement (“Lending Agreement”) and violated two Missouri statutes by fraudulently inducing Plaintiffs to participate in the securities lending program. Those additional

claims gave rise to two new bases for removal that did not previously exist under Plaintiffs' initial petition ("Petition"). These new bases for removal need to be dealt with separately by both State Street and Plaintiffs in the legal argument.

3. On April 13, 2010, Plaintiffs filed their Remand Motion, their Suggestions in Support thereof ("Remand Brief"), and a motion for leave to file their Remand Brief in excess of 15 pages. On April 14, this Court granted Plaintiffs' motion for leave to file their Remand Brief in excess of 15 pages, allowing Plaintiffs to file a Remand Brief totaling thirty pages, exclusive of the table of contents, table of authorities, signature page and attachments.

4. Throughout their Remand Brief, Plaintiffs assert a wide-range of legal arguments alleging that State Street waived its right to have this case heard in federal court. State Street maintains that Plaintiffs misapprehend the additional bases for removal set out in the second notice of removal, misconstrue the law governing successive removals, and mistakenly insist that this Court's previous Remand Order applies to causes of action asserted for the first time in the Amended Petition. Plaintiffs additionally re-assert their claim that they are not "citizens" of the State of Missouri for diversity jurisdiction purposes.

5. Despite its best efforts to be concise in its suggestions in opposition to Plaintiffs' Remand Motion ("Remand Opposition"), State Street reasonably requires more than 15 pages to adequately address all of the objections to removal asserted by Plaintiffs.

6. State Street therefore respectfully requests leave to file its Remand Opposition in excess of the 15-page limitation up to and including a total of 30 pages, exclusive of table of contents, table of authorities, signature page and attachments.

7. State Street sought PSRS's assent to this motion, and PSRS stated that it does not object.

WHEREFORE, State Street requests leave to file its Remand Opposition in excess of the 15-page limitation of Local Rule 7.1(f).

Respectfully Submitted,

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Dated: April 30, 2010

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 30th day of April, 2010, the foregoing was served upon all counsel of record via operation of the Court's electronic filing system:

/s/ Lori A. Martin